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MEMO TO FILE

Telephone Conference Summary: Resolution of EH-232 Comments on MRAP Revised Draft Final ROD

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A conference call was held to discuss resolution of EH-232 comments on the MRAP ROD. EPA Region VIII had reviewed the comments and had previously identified to UNC the comments they felt should be incorporated, which included most comments. The following identifies only those comments agreed to not be incorporated as a result of the conference call, and resolutions which required clarification. A copy of the comments received is also attached.

Comment 3. Resolution: The ROD will identify several potential technologies to be used and state that the appropriate technology will be determined during the design phase.

Comment 7. Resolution: The ROD will include a brief table identifying radium concentrations on the piles and soils, and will include a comparison to the 40 CFR 192 remediation standard.

Comment 8. Resolution: It was agreed that this comment will not be incorporated. It was agreed that risk is one factor in the decision to remediate the millsite, but is not the only reason. DOE would have remediated the site whether CERCLA was involved, or not. Regarding the summary table, a summary risk table was included in a previous draft, and subsequently deleted because it was more confusing to the reader than it was helpful.

Comment 9. Resolution: This comment was agreed to be partially incorporated. EPA has accepted the risk assessment using risk to the population. This acceptance is based on the history of the MRAP risk assessment development and the fact that the clean-up level is health based (40 CFR 192) and will reduce risk to acceptable levels. The radiologic risk assessment was performed prior to EPA's Superfund Public Health Evaluation Manual (1986). A sentence will be added to this section that states that the clean-up levels are health-based and will achieve acceptable risk levels, and a rough estimate of individual risk will be added for the baseline radiological risk.

Comment 10. Resolution: The ROD will add clarification to the reason why the soil ingestion was excluded from further consideration. Although trespassing

is possible, the frequency would be seldom due to the existing security fence and the chance that trespassers would ingest contaminated soil is very low, because ingestion is associated predominantly with very small children. Further, the existing soil cover serves as an additional barrier to ingestion of tailings material itself.

Comment 13. Resolution: This will be added unless it is stated elsewhere and then it will be referred to.

Comment 25. Resolution: A brief discussion will be added to show that the clean-up standard is health based, and it will be stated that the remedy is protective within the specified range established by EPA. An extremely simplified risk to the individual will be provided as well, for comparative purposes.

Comment 26. This comment was agreeed to not be incorporated after clarification of RCRA applicability was given.

Copies to:
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6/13/90

EH-23 Comments on the Monticello Mill Site Draft Record of Decision (ROD)

Overall, the draft ROD does a good job at documenting the selected remedy. It closely follows the format provided in EPA's ROD guidance, and includes most essential components and content in most of the ROD sections. The following comments are provided to strengthen the decision rationale and assure consistency with EPA guidance.

NO.	PAGE	COMMENT
	Declaration	
1	p.1, last para, line 8	The use of the word stabilized is misleading based on EPA terminology. EPA defines stabilization as any treatment technology that utilizes stabilizing agents(ie. cement, pozzolanic, etc.) to physically or chemically bind hazardous constituents into a solid mass to reduce leaching. The selected remedy does not include any such process, so the use of stabilized should be deleted here and throughout the ROD.
2	p.2, 1st para. 1st bullet	Suggest key technical aspects of the repository be briefly highlighted to show its integrity and reliability.
3	p.2, 1st para. 4th bullet	Specify treatment technology(ies) that will be used for runoff/dewatering water
4	p.2, 2nd para. line 8	Mention supplemental standards would allow leaving contamination in place where removal would cause undue enviromental damage.
5	p.2, 2nd para. 3rd bullet(new)	Suggest a new bullet be added to indicate institutional controls would be included if necessary.
6	p.3, last para.	Suggest adding sentence stating that in addition, treatment is not practicable due to extremely large volume of materials.

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NO.	PAGE	COMMENT
	Decision Summary	
7	Sec. 5.0 General	Adding a table(s) which highlights major contaminants, concentrations, & health standards for each major media would be useful to depict contaminants of concern Table 3-3 from RI Report is an example.
8	Sec. 6.0 General	In their FY 89 Rod Analysis, EPA identified documentation of site risks as the priority area for improvement in FY 90. This is also a key area in this ROD that could be improved. This section needs additional information to clearly provide the rationale for taking remedial action (ie. excess lifetime cancer risk outside the risk range). Suggest brief narrative & table (see EPA ROD Guidance, Exhibit C-2) be added at end of section to summarize key risks.
9	p.12, Sec. 6.1.1 last para	Recognizing radiological risk assessment can be more complicated then chemical assessment, still need to correlate annual cancer incidences to excess lifetime cancer risk to show these levels pose a risk outside the 10^{-4} to 10^{-6} risk range. This is important since the radiological risk is the principal health threat driving remedial action. The attached User's Guide: Radionuclide Carcinogenicity should be helpful. (mil?)
10	p.13, Sec. 6.1.2 para. 3 lines 8 & 9	EPA does not allow the use of fences or other institutional controls in establishing baseline risk(see attached note) Should assume some limited entry will occur (trespassers, etc.), & then determine if the soil cover reduces exposure that there is no unacceptable risk. (old guidance)
11	p.14, Sec. 6.1.2 para. 4	The cancer risk attributable to arsenic is presented as 10^{-5}, but then states this is a 1 in 10,000 risk. This error should be corrected. Also, EPA Risk Assessment Guidance uses a concentration level that corresponds to the reasonable maximum exposure rather than the maximum and average exposures, which could show risk is within the risk range. (1 in 100,000)

NO.	PAGE	COMMENT
12	p.16, Sec. 7.1.1 p.17, Sec. 7.1.2	These sections state the no action alternatives would require the use of institutional controls. This is not considered a no action alternative by EPA (see ROD Guidance, p. 9-2), which only allows monitoring as part of no action. Delete mention to institutional controls so these are true no action alternatives.
13	p.16, Sec. 7.1 p.17, Sec. 7.2	Suggest you reiterate the waste type & quantity to be addressed by each OU.
14	p.16, Sec. 7.1.3	How & when will it be determined what is most appropriate treatment technology for runoff water?
15	p.17, line 2	Refer to comment 1. Delete the word stabilization & replace with containment or disposal.
16	p.19, 1st para.	When will EPA & State decide if use of supplemental standards is appropriate? What additional institutional controls will this require?
17	p.19, Sec. 8 General	EPA ROD Guidance recommends for each of the 9 evaluation criteria to discuss the best alternative first, with the other alternatives discussed in sequence.
18	p.22, Table 8-2 columns 3 & 4	Information under these 2 criteria is reversed.
19	p.23, Sec. 8.1.3 p.26, Sec. 8.2.3 Tables 8-1 & 8-2	This criterion applies only to reduction of toxicity, mobility, or volume through treatment. The reduction in mobility thru containment in these alternatives should be deleted from this criterion & addressed under overall protection of human health & environment.
20	p.24, Sec. 8.1.4 p.26, Sec. 8.2.4	Under this criterion, EPA recommends that alternatives not be described as permanent or impermanent, but rather as a continuum. Use wording such as, alternative 2/3 provides greater degree of permanence then alternative 1, and alternative 2 & 3 provide the same degree of permanence.

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NO.	PAGE	COMMENT
21	Sec. 9, General	Throughout this section, delete the word stabilization & replace with containment or disposal.
22	p.27, Sec. 9.1.1 para. 2	Is the proposed repository property contaminated? If not, suggest a brief rationale be provided for using this property rather than the millsite.
23	p.28, para. 5	Suggest you mention the 100,000 yd^3 of contaminated material to be received from MVP was part of the MVP ROD.
24	p.30, Table 9-1	Is the cost of purchasing the repository property included in the total cost?
25	p.35, Sec. 10.1, para. 2	Must correlate annual cancer incidences to excess lifetime cancer risk to show that risk after remediation is within EPA's 10^{-4} - 10^{-6} risk range.
26	p.37, Sec. 10.2.1 p.40, Sec. 10.2.4	Use rationale from Appendix B to highlight here in Statutory Determinations that RCRA is not ARAR. Important to also determine if disposal of waste in repository constitutes RCRA placement, since this would trigger LDR if it is determined in the future that we have RCRA restricted waste.